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**ARTHUR B. GOODKIND**  
202-457-1815

Internet Address:  
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October 3, 2000

VIA CAPITAL FILINGS SPECIALISTS, LLC

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

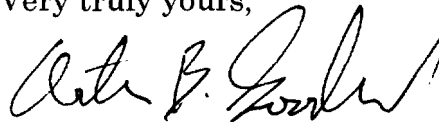
Re: MM Docket No. 00-163, RM-9934, Amendment of Section  
73.622(b), Table of Allotments, Digital Television Broadcast  
Stations (Thief River Falls, Minnesota) to substitute  
Channel 57 for Channel 32

Dear Ms. Salas:

Transmitted herewith, on behalf of Red River Broadcast Company, LLC, are an original and four copies of its "Comments" in the above-referenced proceeding.

In the event there are any questions, please communicate with the undersigned.

Very truly yours,



Arthur B. Goodkind

Enclosure

cc(w/enc.): John Morgan, FCC  
Pam Blumenthal, Esq.

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of	)	
	)	
Amendment of Section 73.622(b),	)	MM Docket No. 00-163
Table of Allotments,	)	RM-9934
Digital Television Broadcast Stations,	)	
(Thief River Falls, Minnesota)	)	
	)	

COMMENTS OF RED RIVER BROADCAST COMPANY, LLC

Red River Broadcast Company, LLC ("Red River"), licensee of television station KBRR(TV), NTSC Channel 10, Thief River Falls, Minnesota, files herewith, by its attorneys, its comments in support of the DTV channel substitution proposed by the Commission in the above-captioned proceeding.

This rule making was initiated at the request of Red River, which filed a petition on December 29, 1999, requesting the substitution of DTV Channel 32 for DTV Channel 57 as the digital transition channel allotted for use by Red River in Thief River Falls. For the Commission's convenience, a copy of Red River's petition for rule making is attached hereto.

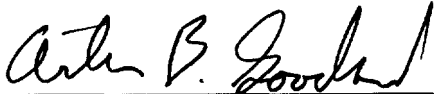
For the reasons stated in the attached petition, Red River requests that the Commission promptly make the proposed substitution of Channel 32 for Channel 57 and that the channel allotment specify a DTV effective radiated power of 1,000 kw at an antenna height of 183 meters above average terrain. Upon completion of the channel substitution, Red River will promptly amend its pending application for a

DTV construction permit to specify Channel 32 and will construct the Channel 32 DTV station in accordance with the requirements of the Commission's Rules.

Accordingly, Red River respectfully requests that the Commission make the DTV channel allotment substitution it has proposed in this proceeding.

Respectfully submitted,

Red River Broadcast Company, LLC

By:   
Arthur B. Goodkind

Holland & Knight LLP  
2100 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20037

October 3, 2000

WAS1 #875155 v1

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

Amendment of Section 72.622(b),	)	MM Docket No. _____
Table of Allotments, Digital	)	RM- _____
Television Broadcast Stations	)	
(Thief River Falls, Minnesota)	)	

To: Chief, Video Services Division  
Mass Media Bureau

**PETITION FOR RULE MAKING**

Red River Broadcast Co., LLC ("Red River"), licensee of television broadcast station KBRR(TV), Thief River Falls, Minnesota, hereby petitions the Commission to amend the DTV Table of Allotments set forth at Section 73.622(b) of its Rules, by changing KBRR's DTV allotment from Channel 57 to Channel 32, and to specify the maximum UHF DTV non-directional power of 1000 kw. This proposal complies with the Commission's Rules for DTV channel allotment substitutions.

The Commission initially allotted DTV Channel 57 to KBRR, which presently serves Thief River Falls on NTSC Channel 10. Because Channel 57 is not a "core" channel, KBRR could be forced to incur additional costs to move to a different DTV

channel in the future.<sup>1</sup> Red River thus retained Cohen Dippell & Everist, P.C., to study the alternative of operating on a substitute channel, DTV Channel 32. Cohen Dippell & Everist evaluated the allotment of DTV Channel 32 for KBRR using OET Bulletin No. 69 and the supplemental processing guidelines that were later issued by the Commission. They evaluated the proposal for technical acceptability by applying the interference standards and other engineering criteria set forth in Section 73.623(c) of the Rules. They also assessed the impact of operation on DTV Channel 32 on other authorized NTSC stations, DTV allotments, and proposed DTV allotments.

Cohen Dippell & Everist concluded that substituting DTV Channel 32 for KBRR in the Table of Allotments would not result in additional interference in excess of that permitted by the Rules. Any interference would be less than the 2% *de minimis* level permitted by Section 22.623. They thus found that Channel 32 could be allotted in accordance with those Rules. (See attached Engineering Statement.)

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<sup>1</sup> Other television station licensees have sought substitute DTV allotments based on this same concern, and the Commission has found that such substitutions should be considered. *See Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Chattanooga, Tennessee), Notice of Proposed Rule Making*, MM Docket No. 99-268, RM-9691 (rel. Aug. 13, 1999) (proposing to use Channel 15 instead of Channel 55).

The Engineering Statement also states that modifying KBRR's DTV allotment to Channel 32, and authorizing the station to operate at the maximum UHF DTV non-directional power of 1000 kw, will generate a service area which totally encompasses Thief River Falls, Minnesota, the station's community of license.

Red River intends to apply for DTV Channel 32 if it is allotted and to build DTV facilities on that channel.

WHEREFORE, Red River respectfully requests that the Section 73.622(b), the DTV Table of Allotments, be amended to specify Channel 32 as the allotment for Station KBRR at Thief River Falls, Minnesota.

Respectfully submitted,

RED RIVER BROADCAST CO., LLC

By: John T. Scott, III  
John T. Scott, III  
Crowell & Moring LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 624-2500

Its Attorneys

Dated: December 29, 1999

ENGINEERING STATEMENT  
PETITION FOR RULE MAKING  
SECTION 73.622 OF THE FCC RULES  
TO CHANGE DTV CHANNEL  
ON BEHALF OF  
KBRR-DT, THIEF RIVER FALLS, MINNESOTA

OCTOBER 1999

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington            )  
  ) ss  
District of Columbia         )

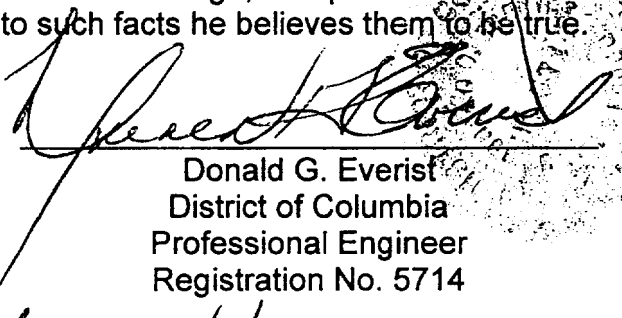
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

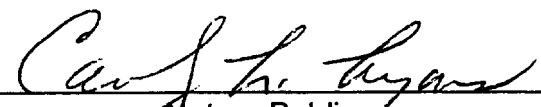
That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

  
Donald G. Everist  
District of Columbia  
Professional Engineer  
Registration No. 5714

Subscribed and sworn to before me this 27<sup>th</sup> day of October, 1999.

  
Notary Public

My Commission Expires: 2/28/2003



This engineering statement has been prepared on behalf of Red River Broadcast Corp., licensee of Television Station KBRR(TV), Thief River Falls, Minnesota. KBRR(TV) is assigned NTSC Channel 10. It is proposed to change the current digital television channel allotment contained in Section 73.622 of the FCC Rules from UHF Channel 57 to UHF Channel 32 at the maximum UHF DT non-directional power of 1000 kW. The resulting service area encompasses the entire community of license.

An allocation study has been performed which assesses the impact of this proposal on other authorized NTSC stations; DTV allotments listed in Table B<sup>1</sup> and other proposed DTV allotments. This technical analysis has been conducted using the Federal Communications Commission's ("FCC"), OET Bulletin 69, dated July 2, 1997 and the FCC's supplemental processing guidelines dated August 1998. The analysis was performed by using the FCC's Longley-Rice ("FLR") model adapted for use for an INTEL computer. The results of this adapted FLR program has been compared to other known FCC studies has been found to give comparable results.

Existing DTV KBRR-DT Allocation Parameters  
Specified in Table of Allotments, Page B-31

<u>DTV Channel</u>	<u>Effective Radiated Power</u> (kW)	<u>Height Above Average Terrain</u> (meters)
57	1000	183
	Existing Site Coordinates	
	<u>Proposed KBRR-DT Facilities</u>	
32	1000	183
	Existing Site Coordinates	

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<sup>1</sup>In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service", MM Docket No. 87-268, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (FCC 98-24), 2/12/98.

As shown in Table 1, modifying the DTV allotment for KBRR(TV) would not impact interference in excess of that permitted by the FCC Rules.

Further, an examination of co-channel television and translators has been performed within 100 km. No low power or translator stations are found. Therefore, it is believed that the request for DTV channel will be consistent with the FCC Rules.

CHANNEL 32  
INTERFERENCE SUMMARY  
KBRR-DT, THIEF RIVER FALLS, MINNESOTA  
OCTOBER 1999

A study of predicted interference by the proposed KBRR-DT service has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows98/Intel platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when differencing a given model's results, e.g., new interference equals total interference less baseline interference. The effect is further reduced for ratios of calculated population values, e.g., incremental population affected as a percent of total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 km<sup>2</sup> using 3-second terrain data sampled approximately every 0.1 km at one degree azimuth intervals with 1990 census centroids.

Baseline KBRR-DT: Allotment, UHF Channel 57, 692.6 kW, 183 M HAAT  
N 48°01'19" L, W 96°22'12" L  
(NAD-27)

Proposed Change: UHF Channel 32 omni-directional, 1000 kW, 183 M HAAT  
N 48°01'19" L, W 96°22'12" L  
(NAD-27)

WCCO-DT, Minneapolis, Minnesota, Channel 32 was studied at 1000 kW omni-directional and a height of 712 meters AMSL. No new interference was received with respect to KBRR-DT's increase in ERP to 1000 kW.